

Exhibit B

Exhibit B

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

_____)	
MALL CHEVROLET, INC.)	
)	
Plaintiffs,)	Civil Action No. 1:18-cv-
)	15077-JBS-KMW
v.)	
)	
GENERAL MOTORS LLC,)	
)	
Defendant.)	
_____)	

AFFIDAVIT OF ROBERT WRIGHT OF CARVANA, LLC

The undersigned, being duly sworn, hereby deposes and says:

1. I am over the age of eighteen years and under the obligation of an oath.
2. I am an Associate General Manager of Reconditioning for Carvana, LLC (“Carvana”) in Delanco, New Jersey. I have worked for Carvana for three (3) years. Carvana is an online used motor vehicle retailer and technology company. Until its motor vehicles are ready for delivery to a customer, Carvana maintains its motor vehicle inventory at one of seven inspection centers: one in Tolleson, Arizona; one in Winder, Georgia; one in Indianapolis, Indiana; one in Delanco, New Jersey; one in Blue Mound, Texas; one in Cleveland, Ohio; and one in Lebanon, Tennessee.
3. Through the regular performance of my work for Carvana, I have become and am familiar with the electronic and hard copy business records that Carvana maintains for tracking the physical locations of the motor vehicles it owns and the repairs performed on those motor vehicles. Carvana generates these records at or near the time of the recorded events, and it is the regular practice of Carvana to generate these records. In connection with this affidavit and through my work for Carvana, I examined Carvana’s business records and have personal knowledge of the matters stated herein.

4. Carvana received a Subpoena to Produce Documents, Information, or Objects dated April 4, 2019, from General Motors LLC (“GM”), commanding Carvana to produce information and documents concerning certain vehicles and Carvana’s relationship with Mall Chevrolet, Inc. (“Mall”) in Cherry Hill, NJ.

5. As part of that subpoena, GM provided Carvana a list of Vehicle Identification Numbers (“VINs”) for 44 vehicles, along with a set of Mall repair orders associated with those 44 VINs. Attached as Exhibit 1 is a copy of the list of VINs that GM provided Carvana. GM provided the information in the first five columns setting forth (a) the Repair Order (“RO”) number, (b) the last five digits in the Job Card (“JC”), (c) the RO date in, (d) the RO date out, and (e) the VIN reflected in Mall’s repair order(s) for each vehicle asked Carvana to confirm (1) whether Mall repaired each vehicle on the date(s) reflected in Mall’s repair order(s) and (2) the physical location of each vehicle on the date(s) reflected in Mall’s repair order(s). Carvana then provided the information in the last three columns setting forth (a) the physical location of each vehicle during the RO dates, (b) repairing dealer, if any, and (3) notes.

6. Attached as Exhibit 2 is a repair order that GM provided Carvana concerning a 2014 GMC Acadia, VIN 1GKKRTKD3EJ106304 – the third vehicle on GM’s list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 2, Mall repaired this Acadia between August 23 and August 24, 2016. Carvana has no record of Mall repairing this Acadia. According to Carvana’s records, this Acadia was physically located at the Carvana inspection center in Blue Mound, TX between August 23 and August 24, 2016.

7. Attached as Exhibit 3 is a repair order that GM provided Carvana concerning a 2014 GMC Terrain, VIN 2GKALUEK8E6371097 – the fourth vehicle on GM’s list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 3, Mall repaired

this Terrain between August 25 and August 31, 2016. Carvana has no record of Mall repairing this Terrain. According to Carvana's records, this Terrain was physically located at the Carvana inspection center in Winder, GA between August 25 and August 31, 2016.

8. Attached as Exhibit 4 is a repair order that GM provided Carvana concerning a 2013 GMC Yukon, VIN 1GKS1EEF4DR205262 – the fifth vehicle on GM's list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 4, Mall repaired this Yukon between August 26 and August 31, 2016. Carvana has no record of Mall repairing this Yukon. According to Carvana's records, this Yukon was physically located at the Carvana inspection center in Blue Mound, TX between August 26 and August 31, 2016.

9. Attached as Exhibit 5 is a repair order that GM provided Carvana concerning a 2013 Buick Enclave, VIN 5GAKRBKD3DJ224164 – the sixth vehicle on GM's list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 5, Mall repaired this Enclave between August 26 and August 31, 2016. Carvana has no record of Mall repairing this Enclave. According to Carvana's records, this Enclave was physically located at the Carvana inspection center in Blue Mound, TX between August 26 and August 31, 2016.

10. Attached as Exhibit 6 is a repair order that GM provided Carvana concerning a 2013 Chevrolet Tahoe, VIN 1GNSKBE0XDR367603 – the seventh vehicle on GM's list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 6, Mall repaired this Tahoe between September 1 and September 2, 2016. Carvana has no record of Mall repairing this Tahoe. According to Carvana's records, this Tahoe was physically located at the Carvana inspection center in Winder, GA between September 1 and September 2, 2016.

11. Attached as Exhibit 7 is a repair order that GM provided Carvana concerning a 2012 GMC Yukon, VIN 1GKS2CE05CR131541 – the ninth vehicle on GM's list of VINs.

Carvana is identified as the customer on this repair order. According to Exhibit 7, Mall repaired this Yukon between September 14 and October 3, 2016. Carvana has no record of Mall repairing this Yukon. According to Carvana's records, this Yukon was physically located at the Carvana inspection center in Winder, GA between September 14 and October 3, 2016.

12. Attached as Exhibit 8 is a repair order that GM provided Carvana concerning a 2013 Chevrolet Traverse, VIN 1GNKVLKD6DJ228507 – the tenth vehicle on GM's list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 8, Mall repaired this Traverse between September 14 to September 16, 2016. Carvana has no record of Mall repairing this Traverse. According to Carvana's records, this Traverse was physically located at the Carvana inspection center in Winder, GA between September 14 to September 16, 2016.

13. Attached as Exhibit 9 is a repair order that GM provided Carvana concerning a 2013 Chevrolet Traverse, VIN 1GNKVFKD1DJ122886 – the eleventh vehicle on GM's list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 9, Mall repaired this Traverse between September 14 and September 17, 2016. Carvana has no record of Mall repairing this Traverse. According to Carvana's records, this Traverse was physically located at the Carvana inspection center in Delanco, NJ between September 14 and September 17, 2016.

14. Attached as Exhibit 10 is a repair order that GM provided Carvana concerning a 2013 Chevrolet Traverse, VIN 1GNKRGKD6DJ112526 – the thirteenth vehicle on GM's list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 10, Mall repaired this Traverse between September 28 and October 3, 2016. Carvana has no record of Mall repairing this Traverse. According to Carvana's records, this Traverse was physically

located at the Carvana inspection center in Winder, GA between September 28 and October 3, 2016.

15. Attached as Exhibit 11 is a repair order that GM provided Carvana concerning a 2013 GMC Acadia, VIN 1GKKRRKD4DJ198430 – the fourteenth vehicle on GM’s list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 11, Mall repaired this Acadia on September 30, 2016. Carvana has no record of Mall repairing this Acadia. According to Carvana’s records, this Acadia was physically located at the Carvana inspection center in Delanco, NJ on September 30, 2016.

16. Attached as Exhibit 12 is a repair order that GM provided Carvana concerning a 2013 GMC Acadia, VIN 1GKKVPKD3DJ138882 – the fifteenth vehicle on GM’s list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 12, Mall repaired this Acadia on September 30, 2016. Carvana has no record of Mall repairing this Acadia. According to Carvana’s records, this Acadia was physically located at the Carvana inspection center in Winder, GA on September 30, 2016.

17. Attached as Exhibit 13 is a repair order that GM provided Carvana concerning a 2012 GMC Terrain, VIN 2GKALUEK4C6322623 – the sixteenth vehicle on GM’s list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 13, Mall repaired this Terrain between October 3 and October 13, 2016. Carvana has no record of Mall repairing this Terrain. According to Carvana’s records, this Terrain was physically located at the Carvana inspection center in Blue Mound, TX between October 3 and October 13, 2016.

18. Attached as Exhibit 14 is a repair order that GM provided Carvana concerning a 2013 GMC Acadia, VIN 1GKKRNED7DJ160971 – the seventeenth vehicle on GM’s list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 14, Mall

repaired this Acadia between October 3 and October 11, 2016. Carvana has no record of Mall repairing this Acadia. According to Carvana's records, this Acadia was physically located at the Carvana inspection center in Winder, GA between October 3 and October 11, 2016.

19. Attached as Exhibit 15 is a repair order that GM provided Carvana concerning a 2013 Chevrolet Traverse, VIN 1GNKRGKD3DJ211997 – the eighteenth vehicle on GM's list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 15, Mall repaired this Traverse between October 3 and October 5, 2016. Carvana has no record of Mall repairing this Traverse. According to Carvana's records, this Traverse was physically located at the Carvana inspection center in Winder, GA between October 3 and October 5, 2016.

20. Attached as Exhibit 16 is a repair order that GM provided Carvana concerning a 2015 Chevrolet Tahoe, VIN 1GNSCBKC4FR157481 – the nineteenth vehicle on GM's list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 16, Mall repaired this Tahoe between October 3 to October 12, 2016. Carvana has no record of Mall repairing this Tahoe. According to Carvana's records, this Tahoe was physically located at the Carvana inspection center in Winder, GA between October 3 to October 12, 2016.

21. Attached as Exhibit 17 is a repair order that GM provided Carvana concerning a 2013 Chevrolet Traverse, VIN 1GNKRGKD8DJ232635 – the twentieth vehicle on GM's list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 17, Mall repaired this Traverse between October 6 and October 7, 2016. Carvana has no record of Mall repairing this Traverse. According to Carvana's records, this Traverse was physically located at the Carvana inspection center in Delanco, NJ between October 6 and October 7, 2016.

22. Attached as Exhibit 18 is a repair order that GM provided Carvana concerning a 2013 Chevrolet Traverse, VIN 1GNKRLKD7DJ261696 – the twenty-first vehicle on GM's list

of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 18, Mall repaired this Traverse on October 11, 2016. Carvana has no record of Mall repairing this Traverse. According to Carvana's records, this Traverse was physically located at the Carvana inspection center in Blue Mound, TX on October 11, 2016.

23. Attached as Exhibit 19 is a repair order that GM provided Carvana concerning a 2012 GMC Terrain, VIN 2GKALUEK6C6365344 – the twenty-second vehicle on GM's list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 19, Mall repaired this Terrain on October 11, 2016. Carvana has no record of Mall repairing this Terrain. According to Carvana's records, this Terrain was physically located at the Carvana inspection center in Blue Mound, TX on October 11, 2016.

24. Attached as Exhibit 20 is a repair order that GM provided Carvana concerning a 2013 GMC Acadia, VIN 1GKKRSKD9DJ181730 – the twenty-third vehicle on GM's list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 20, Mall repaired this Acadia between October 19 and October 20, 2016. Carvana has no record of Mall repairing this Acadia. According to Carvana's records, this Acadia was physically located at the Carvana inspection center in Winder, GA between October 19 and October 20, 2016.

25. Attached as Exhibit 21 is a repair order that GM provided Carvana concerning a 2013 GMC Terrain, VIN 2GKALSEK8D6114850 – the twenty-fourth vehicle on GM's list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 21, Mall repaired this Terrain on October 21, 2016. Carvana has no record of Mall repairing this Terrain. According to Carvana's records, this Terrain was physically located at the Carvana inspection center in Blue Mound, TX on October 21, 2016.

26. Attached as Exhibit 22 is a repair order that GM provided Carvana concerning a 2013 GMC Acadia, VIN 1GKKRPKD2DJ246026 – the twenty-fifth vehicle on GM’s list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 22, Mall repaired this Acadia between October 21 and October 26, 2016. Carvana has no record of Mall repairing this Acadia. According to Carvana’s records, this Acadia was physically located at the Carvana inspection center in Winder, GA between October 21 and October 26, 2016.

27. Attached as Exhibit 23 is a repair order that GM provided Carvana concerning a 2012 Chevrolet Equinox, VIN 2GNFLEEK3C6269671 – the twenty-sixth vehicle on GM’s list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 23, Mall repaired this Equinox between October 26 and October 31, 2016. Carvana has no record of Mall repairing this Equinox. According to Carvana’s records, this Equinox was physically located at the Carvana inspection center in Blue Mound, TX between October 26 and October 31, 2016.

28. Attached as Exhibit 24 is a repair order that GM provided Carvana concerning a 2013 GMC Acadia, VIN 1GKKRRKD3DJ253983 – the twenty-seventh vehicle on GM’s list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 24, Mall repaired this Acadia between October 28 and October 29, 2016. Carvana has no record of Mall repairing this Acadia. According to Carvana’s records, this Acadia was physically located at the Carvana inspection center in Winder, GA between October 28 and October 29, 2016.

29. Attached as Exhibit 25 is a repair order that GM provided Carvana concerning a 2014 Chevrolet Equinox, VIN 2GNALAEK8E6197100 – the thirtieth vehicle on GM’s list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 25, Mall repaired this Equinox between November 2 and November 5, 2016. Carvana has no record of

Mall repairing this Equinox. According to Carvana's records, this Equinox was physically located at the Carvana inspection center in Winder, GA between November 2 and November 5, 2016.

30. Attached as Exhibit 26 is a repair order that GM provided Carvana concerning a 2013 Chevrolet Traverse, VIN 1GNKRFED7DJ175382 – the thirty-first vehicle on GM's list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 26, Mall repaired this Traverse on November 3, 2016. Carvana has no record of Mall repairing this Traverse. According to Carvana's records, this Traverse was physically located at the Carvana inspection center in Winder, GA on November 3, 2016.

31. Attached as Exhibit 27 is a repair order that GM provided Carvana concerning a 2013 Chevrolet Traverse, VIN 1GNKRFED3DJ268321 – the thirty-second vehicle on GM's list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 27, Mall repaired this Traverse on November 11, 2016. Carvana has no record of Mall repairing this Traverse. According to Carvana's records, this Traverse was physically located at the Carvana inspection center in Winder, GA on November 11, 2016.

32. Attached as Exhibit 28 is a repair order that GM provided Carvana concerning a 2015 Chevrolet Corvette, VIN 1G1YB3D78F5106075 – the thirty-third vehicle on GM's list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 28, Mall repaired this Corvette on November 15, 2016. Carvana has no record of Mall repairing this Corvette. According to Carvana's records, this Corvette was physically located at the Carvana inspection center in Winder, GA on November 15, 2016.

33. Attached as Exhibit 29 is a repair order that GM provided Carvana concerning a 2015 Chevrolet Tahoe, VIN 1GNSKCKC2FR119093 – the thirty-fifth vehicle on GM's list of

VINs. Carvana is identified as the customer on this repair order. According to Exhibit 29, Mall repaired this Tahoe on January 10, 2017. Carvana has no record of Mall repairing this Tahoe. According to Carvana's records, this Tahoe was physically located at the Carvana inspection center in Blue Mound, TX on January 10, 2017.

34. Attached as Exhibit 30 is a repair order that GM provided Carvana concerning a 2014 GMC Acadia, VIN 1GKKRTKD2EJ270952 – the thirty-eighth vehicle on GM's list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 30, Mall repaired this Acadia on February 8, 2017. Carvana has no record of Mall repairing this Acadia. According to Carvana's records, this Acadia was physically located at the Carvana inspection center in Blue Mound, TX on February 8, 2017.

35. Attached as Exhibit 31 is a repair order that GM provided Carvana concerning a 2016 Chevrolet Malibu, VIN 1G1ZE5ST0GF206108 – the thirty-ninth vehicle on GM's list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 31, Mall repaired this Malibu on February 9, 2017. Carvana has no record of Mall repairing this Malibu. According to Carvana's records, this Malibu was physically located at the Carvana inspection center in Winder, GA on February 9, 2017.

36. Attached as Exhibit 32 is a repair order that GM provided Carvana concerning a 2014 GMC Terrain, VIN 2GKALUEK3E6132976 – the fortieth vehicle on GM's list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 32, Mall repaired this Terrain between February 21 and February 28, 2017. Carvana has no record of Mall repairing this Terrain. According to Carvana's records, this Terrain was physically located at the Carvana inspection center in Winder, GA between February 21 and February 28, 2017.

37. Attached as Exhibit 33 is a repair order that GM provided Carvana concerning a 2014 GMC Terrain, VIN 2GKFLZE32E6136609 – the forty-first vehicle on GM’s list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 33, Mall repaired this Terrain on February 21, 2017. Carvana has no record of Mall repairing this Terrain. According to Carvana’s records, this Terrain was physically located at the Carvana inspection center in Winder, GA on February 21, 2017.


38. Attached as Exhibit 34 is a repair order that GM provided Carvana concerning a 2014 GMC Terrain, VIN 2GKFLZE39E6295241 – the forty-second vehicle on GM’s list of VINs. Carvana is identified as the customer on this repair order. According to Exhibit 34, Mall repaired this Terrain between February 21 and February 28, 2017. Carvana has no record of Mall repairing this Terrain. According to Carvana’s records, this Terrain was physically located at the Carvana inspection center in Delanco, NJ between February 21 and February 28, 2017.

FURTHER THE AFFIANT SAYETH NOT.


Robert Wright
Associate General Manager, Reconditioning
Carvana, LLC

State of [STATE] New Jersey
) ss.
County of [COUNTY])
Burlington

Signed and sworn to (or affirmed) before me on [DATE] by [NAME], [TITLE], of Carvana Company.


Notary Public (or title/rank of other officer)
My commission expires: Jan 5, 2020

(Signature)

